



POLICY ON PREVENTION OF SEXUAL HARASSMENT

Version 1.2

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Altum Credo Home Finance Private Limited

Floor No. 7, Kalpataru Infinia, Plot No. 21, Sub Plot No.3, CTS No. 15/1 Survey No. 162/2/2, 17/2/2 & 18/1/2 of village Bhamurda, Wakdewadi, Shivajinagar, Pune, 411005, Maharashtra



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Version Control

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1.0	Initial Document	18-12-2018
1.1	Defining email id for process, change of nomenclature from Complaints Committee to Internal Committee, and amendment in Annexure A to include regional Internal Committees.	25-11-2022
1.2	Change in the email id for filing a complaint and committee constitution	18-12-2024

Authorisation Control

Prepared by	Reviewed by	Approved by
AVP – Human Resource & Admin	Chief Compliance Officer	Board of Directors

This Policy adheres to the extant regulatory guidelines in force as on the date of approval/ review of the Policy.



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PURPOSE

The purpose of this policy is to define sexual harassment at the workplace, to ensure that there are measures taken to prevent such unethical behavior, to lay down procedures for curbing such activities and to provide a framework to address issues related to sexual harassment promptly, sensitively and confidentially. The Company is committed to zero tolerance to sexual harassment, if engaged in by any employees, clients or by vendors, customers, suppliers or any other business associates. The Company mandates all employees to read and understand this policy, and abide by it.

SCOPE

- The policy is applicable to all the employees of the company.
- This policy applies to all allegations of sexual harassment made by any employee of the Company against another employee irrespective of whether sexual harassment is alleged to have taken place within the Company premises or in any other place visited by such employee for work.
- All actions prohibited for an employee of the Company by this policy, are also prohibited for all individuals who are on the Company premises or on any other property where the Company conducts its business.
- If an individual commits an act in violation of this policy, whether an employee of the Company or a third party interacting with the Company, the Company will take appropriate remedial measures under the circumstances, including measures to mitigate the potential for repetition, and to discipline any of its employees who may have participated in such conduct, or may have failed to stop such conduct when he or she had actual knowledge of such conduct and the authority to do so.

POLICY

- Altum Credo Home Finance Private Limited (ACHFPL) is committed to providing all its employees an environment free of gender-based discrimination and harassment.
- In furtherance of this commitment, the Company strives to provide all its employees with equal opportunity conditions of employment, free from gender-based coercion, intimidation, or exploitation and to create a work environment where everyone has an opportunity to fully participate in achieving business success and is valued for the distinctive skills, experiences, and perspectives she or he brings to the workplace.
- The Company has zero tolerance for harassment, intimidation, or humiliation of a sexual or gender-based nature in its workplace and is dedicated to ensure enactment, observance and adherence of guidelines and best practices that prevent and prosecute acts of sexual harassment.
- The Company believes that all individuals have the right to be treated with dignity.
- Appropriate disciplinary action would be taken against sexual harassment including discrimination or intimidation of a sexual or gender-based nature by or towards any employee in the workplace.
- The Company will not tolerate retaliation in any form against personnel for raising sexual harassment complaints or concerns.
- The administrative responsibility of this policy lies with the HR Department, Functional Heads/ Line Managers.
- **Definitions and examples of sexual harassment:**
 - a) "Act" means the Sexual Harassment of women at workplace (Prevention, Prohibition and redressal) Act, 2013
 - b) "Employee" means a person employed with the Company whether for any work on regular or temporary, ad hoc or daily wage basis, either directly or through an agent, including a



contractor, whether for remuneration or not, or working on voluntary basis or otherwise, includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any such name.

- c) "Complainant" means in relation to a workplace, an individual of an age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- d) "Internal Committee" means the Committee formed under the Act by the Company as detailed in Annexure A and as constituted from time to time.
- e) "Member" means a member of the Internal Committee
- f) "Presiding Officer" means the Presiding Officer of the Internal Committee nominated under the Act.
- g) "Respondent" means a person against whom a complaint has been made by the Complainant.
- h) "Sexual harassment" includes as any one or more of the following unwelcome acts or behaviors (direct or implied):
 - 1. Physical contact and/or advances; or
 - 2. A demand or request for sexual favors; or
 - 3. Making sexually colored remarks; or
 - 4. Showing pornography; or
 - 5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
 - 6. Physical and/or verbal or non-verbal comments, remarks or jokes, letters, phone calls or gesture of sexual nature.
 - 7. Circulating obscene content by email, SMS, MMS or other digital mediums
 - 8. The following circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:
 - a. Implied or explicit promise of preferential treatment in employment
 - b. Implied or explicit threat of detrimental treatment in employment
 - c. Implied or explicit threat about the present or future employment status
 - d. Interference with work or creating intimidating or offensive or hostile work environment.
 - e. implied or explicit threat of detrimental treatment in employment.
 - 9. Commission of any one or more of the above-mentioned acts is humiliating and will constitute as a health and safety problem seen to be a violation of this Policy.

The above examples and words used are for educational purposes and shall not at all limit the meaning of sexual harassment. The reasonable person standard is used to determine whether or not the conduct was offensive and what a reasonable person would have done. Further, it is important to note that whether sexual harassment has occurred or not, does not depend on the intention of the person committing the unwelcome act, but on the experience of the aggrieved employee or impact on the aggrieved employee.

- i) "Workplace" of the Company includes would consist of any place where the employee works or visits as a function of his employment with the Company including transportation provided by the Company, if any.

- **Obligations of the Company**

- a) The Company does not tolerate sexual harassment of any kind and will take action against any employee for any conduct that violates this policy.
- b) The Company shall be responsible, among others, for the following:
 - 1. To prohibit, prevent, and deter commission of acts of sexual harassment;
 - 2. To implement the policy by prohibiting gender-based discrimination and providing a safe & harassment-free work environment;



3. To spread awareness of the policy amongst its employees by publication, notification, and circulation of the policy;
 4. To provide fair and impartial procedures for resolution, investigation, or prosecution of acts of sexual harassment by taking all necessary steps;
 5. To set up the Internal Committee; and
 6. To implement the recommendations of the Internal Committee.
- c) Where sexual harassment occurs as a result of an act or omission by any third party or an outsider, the company shall take all steps necessary and reasonable to assist the affected persons in terms of support and preventive action.

- **Internal Committee**

- a) An Internal Committee is set up by the Company which will deal with all cases of alleged sexual harassment whether escalated to it by any Company employee, to prevent and deal with sexual harassment and to otherwise implement the Policy.
- b) The Internal Committee is intended to be an independent, objective, and unbiased fact-finding body established to investigate any complaints of sexual harassment in a fair, reasonable, and time-bound manner in a neutral environment.
- c) The Internal Committee shall have the following composition:
 1. a three (3)-member committee under the Chairpersonship of a senior woman employee and will include two (2) members from amongst the employees, preferably committed to the cause of women or having experience in social work, HR matters or legal knowledge.
 2. one (1) member from outside the Company (an NGO representative or outside counsel familiar or dealing with cases of sexual harassment at workplace);
 3. provided that at least 50% of the members be women and the Internal Committee will be headed by a woman appointed by the Internal Internal Committee from amongst its members.
- d) A person shall be disqualified for being appointed, elected, nominated or designated, or for continuing, as a member of the Internal Committee, for any period of time during which there is any complaint concerning sexual harassment pending against him/her or if he/she is found guilty of sexual harassment.
- e) To the fullest extent practicable and consistent with the Internal Committee's need to investigate and ensure that corrective action is taken, all complaints of sexual harassment by employees will be processed with strict confidentiality.

PROCESS

- **Filing a complaint**

- a) Any aggrieved employee may approach the Internal Committee with a written complaint of sexual harassment under this Policy or send an email to the address: IC@altumcredo.com
- b) A complaint of sexual harassment can be filed within a time limit of three (3) months. This may be extended to another three (3) months if the woman can prove that grave circumstances prevented her from doing the same at the discretion of the Complaints Committee.
- c) In the event the Complainant is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, the legal heir or such complainant for example a relative, friend or co-worker can make a complaint. Any person who has knowledge of incident can also make a complaint with the written consent of the Complainant.
- d) An employee making a complaint ("Complainant") has to give the complaint to the Internal Committee in writing along with supporting documents, names and addresses of witnesses and the said complaint will be afforded confidentiality as described above.



- e) Within seven (7) working days of the receipt of the complaint, the Internal Committee has to send a copy of the complaint to the alleged accused ("Respondent") who will have ten (10) working days to file reply along with list of documents, names, and addresses of witnesses.
 - f) At the first meeting of the Internal Committee, the Complainant shall be heard and the Internal Committee may, before initiating an enquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation; provided there can be no monetary settlement as the basis of conciliation.
 - g) In case there is no request for conciliation or conciliation attempt fails, the Internal Committee shall proceed with the complaint and, approach the Respondent to inform him of the allegation in order to start the investigation.
 - h) During the pendency of an inquiry on a written request by the complainant, the Internal Committee as the case may be, may recommend to the Employer to:
 - (i) transfer the complainant or the respondent to any other workplace or
 - (ii) grant leave to the complainant up to a period of three months; or
 - (iii) grant any other relief to the complainant as may be prescribed by the Act.The leaves granted to the complainant in this case shall be in addition to the leave the Complainant would be otherwise entitled.
 - i) The IC shall make inquiry into the complaint in accordance with the principles of natural justice.
 - j) The Parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.
 - k) In conducting the inquiry, a minimum of three members of the IC including the Presiding Officer shall be present.
 - l) For the purpose of making an inquiry, the IC shall have the same powers of a civil court under the Code of Civil Procedure, 1908 i.e.:
 - (i) summoning and enforcing the attendance of any person and examining him on oath.
 - (ii) requiring the discovery and production of documents; and
 - (iii) any other matter which may be prescribed.
 - m) Any employee who has reason to know or believe that another employee is being subjected to sexual or other harassment is urged to make the matter known to the Committee or to an officer of the Human Resources Department. No retaliatory action will be taken against employees for reporting harassment to the employer.
- **Proceedings of the Internal Committee:**
 - a) The Committee shall conduct the enquiry in accordance with principles of natural justice. It will broadly be governed by the following principles in conducting its proceedings:
 - b) The Internal Committee shall give every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective cases and shall ensure that the Complainant and the Respondent have full opportunity to present their claims, witnesses and evidence which may establish or substantiate their claims.
 - c) Both the Complainant and the Respondent shall have the right to submit supporting evidence and shall have the right to bring their respective witnesses, if any, to be examined by the Internal Committee.
 - d) If the Complainant or the Respondent fails, without sufficient cause, to be present before the Internal Committee for three (3) consecutive hearings, the Internal Committee will give a notice of fifteen (15) days to the concerned party before terminating the enquiry



proceedings or giving an ex-parte decision on the complaint.

- e) The Complainant, the Respondent, witnesses or any other person that the Internal Committee meets with, interacts with, or has a teleconference or video conference with, for the purpose of enquiry into any complaint of sexual harassment shall be bound by strict confidentiality as described above and each such party shall not be permitted to discuss the Internal Committee proceedings with any third person
- f) The Committee is required to complete the inquiry within a time period of ninety (90) days from the date on which the Complaint is filed by the Complainant
- g) The Internal Committee shall complete the enquiry and make a report of its findings on the Complaint and its recommendations to the senior management of the Company ("Management") within a period of ten (10) days from the conclusion of the enquiry procedure set out above. The report of the Internal Committee shall also include recommendations for the imposition of any penalty and the reasons for such recommendations to the Management.

- **Implementation of recommendations of the Internal Committee**

- a) The Management shall consider the recommendations and findings of the Internal Committee and take a decision. Action must be taken within sixty (60) days of the submission of the report by the Internal Committee.
- b) The Management may issue such order or directions as it deems fit and shall inform the Complainant and the Respondent of its decision.
- c) The Management of the Company shall provide all necessary assistance to the Internal Committee for the purpose of ensuring full, effective and speedy implementation of this procedure for investigating any complaint of sexual harassment at work place in accordance with the Policy.

- **Penal Consequences**

- a) The Management shall take an appropriate action for misconduct against the employee under the Company policy. Such actions may include any of the following:
 - 1. Written apology;
 - 2. Gender sensitization and sexual harassment training;
 - 3. Counselling
 - 4. Community service;
 - 5. Warning;
 - 6. Reprimand or censure;
 - 7. Withholding of promotion;
 - 8. Demotion;
 - 9. Withholding of pay rise or increments;
 - 10. Termination of employment;
- b) In the event the Complainant decides to pursue personal action against the Respondent, the Company is obliged to provide all assistance and cooperation in any investigation by the relevant law enforcement agencies.

- **Protection against Victimization**

- a) In the event the Respondent is the Complainant's supervisor/superior, the Company shall, during the pendency of the Complaint, ensure that the reporting relationship is suspended and that the Complainant is not subject to appraisal by the Respondent.
- b) The Company shall strictly prohibit any sort of retaliation against the Complainant or any witnesses. Any act of reprisal, including internal interference, coercion, and restraint, by the



Respondent, whether directly or indirectly, will result in appropriate action against the Respondent by the Management in consultation with the Internal Internal Committee.

- c) Where the Respondent is an outsider, during the pendency of the investigation of the Complaint and even thereafter, if found guilty, the Respondent shall not be allowed to enter the Company premises except for the purpose of attending the Internal Internal Committee proceedings.
- d) In the event of the Respondent and the Complainant both being employees of the Company, and the Respondent is found to be guilty, irrespective of the penalty imposed, the Company shall ensure that the Respondent shall not write the appraisal report of the Complainant, if the person is otherwise so authorized.
- e) In the event, the Internal Internal Committee after investigation of a Complaint in accordance with the procedure prescribed herein, concludes that the Complaint was false, frivolous or made with malafide intention by the Complainant including due to personal issues with the Respondent, then the Internal Committee shall make such appropriate recommendations to the Management to take action against the Complainant, as may be necessary. However, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

- **Modification and review of this policy**

- a) The Company reserves the right to modify and, or, review the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or otherwise with a view to revise the provisions of this Policy to the extent deemed necessary by the Company from time to time.
- b) Any such changes or modifications may be notified by the Company to its employees in due course.
- c) **Act. v. Policy**
Except for this Policy being gender neutral and applicable equally to all the Employees of the Company irrespective of their genders, this Policy shall be governed by the Act. In case of any inconsistencies between the Act and this Policy, the Act shall prevail. The Act, any amendments to the Act, rules framed thereunder shall become applicable as and when they become effective and shall supersede the terms mentioned in this Policy.

REVIEW

The policy shall be reviewed by the Board annually.

EFFECTIVE DATE

The policy shall be effective from the date of approval by the Board of Directors / subsequent date of review as mentioned above.



ANNEXURE A

1. Names of the Internal Committee (IC) members of **Maharashtra**

Sr. No.	Name of the person	Nature	Designation
1.	Ms. Natasha Dsilva	Employee	Presiding officer
2.	Ms. Aditi Talwalkar	Employee	Member
3.	Mr. Vivek Jain	Employee	Member
4.	Ms. Vrishti Kaushik	Employee	Member
5.	Adv. Deepti Dole	Non-employee	External member

2. Names of the Internal Committee (IC) members of **Karnataka**

Sr. No.	Name of the person	Nature	Designation
1.	Ms. Natasha Dsilva	Employee	Presiding officer
2.	Ms. Aditi Talwalkar	Employee	Member
3.	Mr. Vivek Jain	Employee	Member
4.	Ms. Vrishti Kaushik	Employee	Member
5.	Mr. Sharanabasappa Mashyal	Employee	Member
6.	Adv. Deepti Dole	Non-employee	External member

3. Names of the Internal Committee (IC) members of **Tamil Nadu**

Sr. No.	Name of the person	Nature	Designation
1.	Ms. Natasha Dsilva	Employee	Presiding officer
2.	Ms. Aditi Talwalkar	Employee	Member
3.	Mr. Vivek Jain	Employee	Member
4.	Ms. Vrishti Kaushik	Employee	Member
5.	Mr. Sureshkumar R	Employee	Member
6.	Adv. Deepti Dole	Non-employee	External member

4. Names of the Internal Committee (IC) members of **Rajasthan**

Sr. No.	Name of the person	Nature	Designation
1.	Ms. Natasha Dsilva	Employee	Presiding officer
2.	Ms. Aditi Talwalkar	Employee	Member
3.	Mr. Vivek Jain	Employee	Member
4.	Ms. Vrishti Kaushik	Employee	Member
5.	Mr. Prem Sagar Jajware	Employee	Member
6.	Adv. Deepti Dole	Non-employee	External member

5. Names of the Internal Committee (IC) members of **Andhra Pradesh**

Sr. No.	Name of the person	Nature	Designation
1.	Ms. Natasha Dsilva	Employee	Presiding officer
2.	Ms. Aditi Talwalkar	Employee	Member
3.	Mr. Vivek Jain	Employee	Member



4.	Ms. Vrishti Kaushik	Employee	Member
5.	Mr. Srinath Sharma	Employee	Member
6.	Adv. Deepti Dole	Non-employee	External member

6. Names of the Internal Committee (IC) members of **Telangana**

Sr. No.	Name of the person	Nature	Designation
1.	Ms. Natasha Dsilva	Employee	Presiding officer
2.	Ms. Aditi Talwalkar	Employee	Member
3.	Mr. Vivek Jain	Employee	Member
4.	Ms. Vrishti Kaushik	Employee	Member
5.	Ms. Moon Marri Roy	Employee	Member
6.	Adv. Deepti Dole	Non-employee	External member